Winston & Winston, P.C.
Attorneys for JPMorgan Chase Bank, N.A., (Secured 708 Third Avenue, 5th Floor, Suite 142
New York, NY 10017
(212) 532-2700
Aleksander Powietrrzynski, Esq.

Debtors.

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

.

In Re:

Anthony F. Bettini and Zoraida Bettini a/k/a Zoraida Feliberti a/k/a Zoraida Ferrer a/k/a Zoraida Ferrer-Bettini,

(Chapter 7)

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY PURSUANT TO 11 U.S.C. SECTION 362 AND 365

Case No. 18-44525-NHL

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE upon the annexed Motion for Relief including all the papers and exhibits and upon all the papers filed in this case JPMorgan Chase Bank, N.A., (hereinafter "Movant"), pursuant to Federal Rules of Bankruptcy Procedure 4001(a) and 9014, will move before the Honorable Judge Nancy Hershey Lord, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of New York, 271-C Cadman Plaza East, Suite 3577, Brooklyn, NY 11201-1800, on November 7, 2019 at 11:30 AM or as soon thereafter as counsel may be heard, for entry of an order granting relief from the Automatic Stay pursuant to 11 U.S.C. §§ 362 and 365 and waiver of the requirement of F.R.B.P. Rule 4001 that requires that the Order Granting Relief from the Automatic Stay be effective fourteen days from the date of entry of said Order, and for other and further relief that this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Order, can (i) be made in writing, (ii) state with particularity the grounds therefore, (iii) be filed with the Bankruptcy Court (with a copy to the Judge's chambers), and (iv) be served upon (a) the undersigned, Aleksander Powietrrzynski, attorney for JPMorgan Chase Bank, N.A., at Winston & Winston, P.C., 708 Third Avenue, 5th Floor, Suite 142, New York, NY 10017 (b) counsels to Debtors, Kevin Zazzera, 182 Rose Avenue, Suite 3, Staten Island, NY 10306, (c) the United States Trustee for the Eastern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014 and (d) the Chapter 13 Trustee, Rachard J. McCord, Certilman Balin Adler & Hyman, 90 Merrick Avenue, East Meadow, NY 11554, together with proof of service thereof, so as to be received no later than October 31, 2019 seven (7) days before the return date and filed with the Court together with proof of service thereof in accordance with the Local Rules of Bankruptcy Procedure for the Eastern District of New York.

PLEASE TAKE FURTHER NOTICE IF YOU INTEND TO OPPOSE THIS MOTION, WRITTEN OPPOSITION MUST BE FILED WITH THE CLERK OF THE COURT AND SERVED ON MOVANT'S COUNSEL AT LEAST SEVEN (7) DAYS PRIOR TO THE RETURN DATE. IF YOU DO NOT FILE AND SERVE WRITTEN OPPOSITION, NO HEARING WILL BE HELD ON THE RETURN DATE AND THE COURT MAY GRANT THE MOTION AS UNOPPOSED.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without notice other than by announcement of the adjourned date in open court or by posting such adjourned date on the Court's calendar on or about the aforementioned date.

Date: August 6, 2019

New York, New York

Aleksander Powietrrzynski Winston & Winston, P.C.

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